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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Case No. 3:11-cv-2509-LHK

**DECLARATION OF THOMAS M. JEON
ON BEHALF OF LUCASFILM LTD.
PURSUANT TO COURT'S APRIL 15, 2013
ORDER (DKT. 402)**

Courtroom: 8, 4th Floor
Judge: Hon. Lucy H. Koh

Date Consol. Amended Compl. Filed:
September 13, 2011

Trial Date: November 12, 2013

1 I, THOMAS M. JEON, state and declare as follows:

2 1. I am an attorney admitted to practice in the State of California and am in-house
 3 counsel in the Business Affairs department at Lucasfilm Ltd. I have personal knowledge of the
 4 facts stated in this declaration and, if called upon to do so, could and would competently testify
 5 under oath thereto.

6 2. I submit this declaration in response to the Court's April 15, 2013 Order directing
 7 in-house counsel for each Defendant in this case to file a sworn declaration confirming the
 8 production of all compensation materials responsive to Plaintiffs' Requests for Production of
 9 Documents. (Dkt. 402)

10 3. I have been the Lucasfilm in-house attorney with primary responsibility for
 11 overseeing Lucasfilm's document collection in this case, including the collection of documents
 12 related to Lucasfilm's compensation of employees. In that capacity, I have worked with
 13 Lucasfilm's employees, outside counsel, and vendors to search for, collect, and produce
 14 Lucasfilm documents responsive to Plaintiffs' Requests for Production.

15 4. Lucasfilm has made a diligent search for all non-privileged documents concerning
 16 compensation of Lucasfilm employees for each year in the discovery period in this case that are
 17 maintained in the ordinary course of its business and are responsive to Plaintiffs' Requests for
 18 Production of Documents, as the scope of those Requests have been defined by agreement of the
 19 parties. Lucasfilm collected and produced all documents located pursuant to this search.

20 5. Lucasfilm's search, collection, and production efforts included the following
 21 categories and sources of materials:

22 i) Electronically-stored information of 29 individual custodians, pursuant to
 23 search terms agreed to by the parties, and including Plaintiffs' requests for additional custodians
 24 and additional search terms after an initial search was conducted;

25 ii) Collection of responsive policy or high-level summary documents that
 26 were identified by knowledgeable Lucasfilm personnel;

27 iii) Searches of paper and electronic repositories identified by knowledgeable
 28 Lucasfilm personnel;

- iv) Targeted searches of relevant repositories in response to Plaintiffs' requests made outside of formal requests for production of documents;

v) Lucasfilm's payroll, human resources, and recruiting databases, including both its current databases and legacy databases that are no longer maintained or in use.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed in San Francisco, California, on April 24, 2013.

THOMAS M. JEON